

I am a licensed Amateur Radio Operator (Extra Class, N4AOF), a licensed GMRS operator (WPOL710), and an authorized operator of several licensed commercial systems (WPRT970, etc), as well as an active user of the Family Radio Service.

I am vigorously opposed to the petitioner's request in RM-10564. The conditions ITA claims to be concerned about simply do not exist and the small footprint of FRS operation makes it unlikely that any business use of FRS could ever cause the sort of congestion they claim to fear. Quite the contrary, FRS is mostly uncongested even in dense metropolitan areas and any congestion that does exist almost always consists of children using FRS radios marketed as toys. If congestion were to exist, such congestion would almost certainly drive any business use off the frequency. Personal users can tolerate congestion or easily change channels whereas business users typically have less ability to accept delays and cannot as easily change channels to avoid congestion. Businesses that have wide area communication needs or mission critical communication needs will not be able to use FRS anyway. The only instances of businesses using FRS on a routine basis are for single-site communications within a single store or plant and perhaps its adjacent parking lot. For these businesses, FRS is simply a lower cost alternative to the Part 90 itinerant frequencies that really ARE over crowded. Because FRS has a much smaller footprint than either the Part 90 itinerant frequencies or MURS, such occasional business use of FRS actually reduces overall congestion and improves overall spectrum efficiency.

Nowhere in the petition does ITA demonstrate or even claim any harm to its membership from this supposed congestion on FRS. It seems that the only harm anyone faces from business use of FRS is the possibility that ITA might lose some of its lucrative business by not having to "coordinate" license applications from businesses whose communications needs don't really require use of a coordinated frequency anyway.